

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., *et al.*,

Plaintiffs,

v.

GRATO INTERNATIONAL, *et al.*,

Defendants.

CASE NO. 2:22-cv-01205-RSL

ORDER DENYING REQUEST FOR
APPOINTMENT OF COUNSEL

This matter comes before the Court on defendant Rizwa Iqbal's second letter request for court-appointed counsel. Dkt. # 65.

Generally, a person has no right to counsel in civil actions. *See Storseth v. Spellman*, 654 F.2d 1349, 1353 (9th Cir. 1981). However, a court may under "exceptional circumstances" appoint counsel for indigent civil litigants pursuant to 28 U.S.C. § 1915(e)(1). *Agyeman v. Corrs. Corp. of Am.*, 390 F.3d 1101, 1103 (9th Cir. 2004). When determining whether "exceptional circumstances" exist, a court must consider "the likelihood of success on the merits as well as the ability of the petitioner to articulate his claims *pro se* in light of the complexity of the legal issues involved." *Weygandt v. Look*, 718 F.2d 952, 954 (9th Cir. 1983). Neither of these considerations is dispositive and instead must be viewed together. *Wilborn v. Escalderon*, 789 F.2d 1328, 1331 (9th Cir. 1986).


1 *Palmer v. Valdez*, 560 F.3d 965, 970 (9th Cir. 2009). In addition, the party seeking
2 appointment of counsel must show indigency.

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4 Mr. Iqbal has produced evidence of indigency and confirms that he is unable to
5 afford legal representation to defend himself in this matter. Plaintiffs, Amazon.com and
6 World Wrestling Entertainment, Inc., have accused Mr. Iqbal of trademark counterfeiting,
7 trademark infringement, copyright infringement, false advertising, and false designation of
8 origin in violation of the Lanham Act, 15 U.S.C. § 1121, breach of contract, and unfair and
9 deceptive acts in violation of the Washington Consumer Protection Act. While the factual
10 allegations regarding the conduct alleged are not complicated, intellectual property is a
11 challenging area of law even those who have legal training. Mr. Iqbal asserts that he does
12 not have the legal knowledge or ability to understand the claims brought against him or to
13 respond appropriately.
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16 Unfortunately, Mr. Iqbal's situation is not "exceptional." Amazon.com and its
17 vendors have filed approximately 100 trademark and copyright infringement actions in this
18 District, suing hundreds, if not thousands, of entities and individuals like Mr. Iqbal, many
19 of whom are equally impecunious, reside outside the United States, and are equally
20 unfamiliar with the relevant law. This District does not have the resources to provide
21 counsel to all *pro se* litigants and generally reserves court-appointed representation for
22 those claiming that their civil rights have been violated. *See* General Order 07-23 (adopting
23 an amended Plan for the Representation of *Pro Se* Litigants in Civil Rights Actions).
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1 The request for court-appointed counsel is therefore DENIED.
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3 DATED this 12th day of May, 2025.
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6 Robert S. Lasnik
7 United States District Judge
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